

EXHIBIT 1

From: Gregory Jordan
To: Brian Tollefson; Stephen Stern; Alan Garten
Cc: tgagliardo@gelawyer.com
Subject: Follow Up on Discovery and Protective Order Issues
Date: Wednesday, June 8, 2022 6:00:24 PM
Attachments: ~WRD0000.jpg
MSP Confidential Report.pdf
AA County SA Declination Letter.pdf
Email from Agent Bender to John White.pdf
IAU Report.pdf
Criminal Investigation Report Redacted.pdf
DP Solutions Invoice.pdf

I received John White's deposition transcript on June 3, 2022. Did you receive it? I have not received identification of any trade secrets from your side. Counsel for Mike White, Daniel White, and Chip DiPaula have asked for a copy. I intend to deliver the transcript as a professional courtesy unless you can explain why I should not do so. I am sure it has relevance to the lawsuit Compass filed against those parties.

I have attached documents provided to us that were obtained in response to a PIA request made in 2020. While I regret I did not have them when I deposed John White, David Boshea may use one or all of the documents in litigation.

I want to follow up on documents I requested that Compass produce. In my May 19, 2022 email to Stephen Stern, I requested the following, which I have not received.

"Yesterday John White testified that Compass has five different versions of John Adams' contract. I only received one that John White did not sign. Please send the various versions.

Mr. White also said that he received a police report regarding Michael and George White's hijacking Compass Marketing's domain name. Please provide that report."

I note the reports appear to contradict Mr. White's sworn testimony to having received the report concerning the authorities undertaking a criminal case. Certainly, something could have changed in the intervening period. John White, on May 18, 2022, testified as follows:

John White testified at p. 210

A. Greg, to be clear, you are asking me what's my personal knowledge of what efforts Compass Marketing undertook?

Q. That is correct.

A. My personal knowledge is that Compass Marketing engaged cybersecurity experts and a company called Data Link. That Compass contacted Microsoft and Google. Compass -- I asked directly, three times in writing to George White for the passcode and the credentials. And we reported to the police who investigated and determined that George and Michael

White were still having access to the account after they were terminated.

Q. What police told you that?

A. The Maryland State Police.

Q. Okay. So you're saying that the Maryland State Police told you that Michael White, they did an investigation and Michael White and George White had access to this?

A. Yes.

John White testified about a report on p. 213

Q. Okay. When did the police tell you that they had some information showing that Michael White and George White had access to the control of the domain?

A. Just recently in a report they released.

John White, on p. 214 of his transcript, testified

Q. When did the Maryland State Police let you know that George -- they had information showing that George White and Michael White controlled the domain?

A. The State Police released a report two days ago that showed that George White and Michael White had access to the email systems after their employment with the company.

I have great interest in receiving the State Police report or any other law enforcement agency's report that John White/Compass received. I also need your side to deliver the drafts of the John Adams contract. If one of the versions bears a signature from a Compass officer, I have a particular interest in seeing that document.

Gregory J. Jordan

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Jordan & Zito LLC

From: Judith G. Cornwell <JCornwell@steinsperling.com>
Sent: Thursday, June 2, 2022 2:06 AM
To: Gregory Jordan <gjordan@jz-llc.com>
Cc: Jeff M. Schwaber <JSchwaber@steinsperling.com>
Subject: investigative reports/findings [SS-LEGAL.FID1650651]

Hi Greg –

Attached are documents provided in response to a PIA request made in 2020.

Thanks,
Judy

JUDITH G. CORNWELL
ATTORNEY AT LAW



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